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FILED FOR THE

5 Attorneys for Defendants  
COUNTY OF SANTA CLARA and Its  
6 Santa Clara Valley Medical Center,  
PAUL ESTESS AND ANNA HUGHES  
7

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10

11 HUIMIN SONG,

12 Plaintiff,

13 v.

14 COUNTY OF SANTA CLARA; SANTA  
CLARA VALLEY MEDICAL CENTER; PAUL  
15 ESTESS, ANNA HUGHES; and Does 1 through  
70,  
16

17 Defendants.

No. 12-CV05848 RMW

**STIPULATION AND ORDER ENLARGING  
TIME FOR DEFENDANTS TO RESPOND  
TO PLAINTIFF'S FIRST AMENDED  
COMPLAINT AND CONTINUANCE OF  
CASE MANAGEMENT CONFERENCE**

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1 The parties, through their respective counsel of record, hereby stipulate and agree to an order  
2 enlarging time, until May 8, 2013, for Defendants County of Santa Clara and its Santa Clara Valley  
3 Medical Center, Paul Estess and Anna Hughes to file and serve a response to the First Amended  
4 Complaint of Plaintiffs Huimin Song. The First Amended Complaint was served on March 13,  
5 2013.

6 Good cause exists for this enlargement of time (30 additional days). Song and the County of  
7 Santa Clara are involved in litigation in the matter of *Huimin Song and Andy Xie v. County of Santa*  
8 *Clara, Santa Clara Valley Medical Center, et. al.*, Case No. CV11-04450, pending before United  
9 States District Judge Edward J. Davila. The parties have been engaged in private mediation since  
10 January 16, 2013 with mediator Kael Briski of the Briski Mediation Group. Since the initial  
11 mediation on January 16, the parties and Mr. Briski have had countless email communications, two  
12 face to face discussions and no less than twelve phone conferences. Settlement demands, offers and  
13 terms of resolution have been exchanged. The parties are in the process of scheduling another  
14 mediation session during the week of April 15, 2013. The settlement discussions have involved  
15 resolution of all issues, including the allegations giving rise to this lawsuit, between Song and the  
16 County. In view of the time and effort that will be necessary to prepare an appropriate responsive  
17 pleading, and the impending mediation session which the parties are hopeful will end both lawsuits,  
18 the parties respectfully request an order enlarging Defendants time to respond to the First Amended  
19 Complaint. Furthermore, the parties request that the Case Management Conference be continued to  
20 Friday, May 17, 2013, 10:30 a.m.

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1 I hereby attest that I have on file the holograph signature indicated by a "conformed"  
2 signature (/S/) within this e-filed document.

3 IT IS SO STIPULATED

4 Respectfully submitted,

5 LAW OFFICES OF  
6 BONNER & BONNER

7 Dated: March 26, 2013

By: \_\_\_\_\_/S/

8 CHARLES A. BONNER, ESQ.  
9 Attorney for Plaintiff  
10 HUIMIN SONG

11 ORRY P. KORB  
12 County Counsel

13 Dated: March 26, 2013

By: \_\_\_\_\_/S/

14 JOHN L. WINCHESTER, III  
15 Deputy County Counsel

16 Attorneys for Defendant  
17 COUNTY OF SANTA CLARA and Its  
18 Santa Clara Valley Medical Center,  
19 PAUL ESTESS AND ANNA HUGHES

20 **ORDER**

21 Defendants may have to and including May 8, 2013 by which to file and serve a response to  
22 Plaintiff's First Amended Complaint. The Case Management Conference is continued to May 17,  
23 2013, 10:30 a.m. The Joint Case Management Statement is to be filed no later than May 10, 2013.

24 Dated: HON BH

25   
26 HONORABLE RONALD M. WHYTE  
27 United States District Court Judge  
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